

Assigned for all purposes to: Spring Street Courthouse, Judicial Officer: Stephen Goorvitch

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5 Attorneys for Plaintiff,
ZHOIE PEREZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

10 ZHOIE PEREZ, an individual;

J 1 Plaintiff,

12 | VS.

13 EDDUIN ZELAYA GRUNFELD, an individual;
14 ETZ JACOB TORAH CENTER, a California
business entity form unknown; OHEL CHANA
HIGH SCHOOL, a California business entity form
unknown; and DOES 1 to 50, Inclusive;

Defendants.

CASE NO.:

COMPLAINT FOR DAMAGES FOR:

1. ASSAULT AND BATTERY
 2. FALSE IMPRISONMENT
 3. NEGLIGENCE
 4. VIOLATIONS OF THE RALPH CIVIL RIGHTS ACT, CIVIL CODE § 51.7; AND
 5. VIOLATIONS OF THE BANE CIVIL RIGHTS ACT, CIVIL CODE § 52.1

**** DEMAND FOR JURY TRIAL ****

18 COMES NOW, Plaintiff ZHOIE PEREZ, an individual, who complains and alleges against
19 the defendants, EDDUIN ZELAYA GRUNFELD, ETZ JACOB TORAH CENTER, OHEL
20 CHANA HIGH SCHOOL, and each of them, including DOES 1 through 50, Inclusive (hereinafter
21 collectively referred to as "Defendants"), the following:

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PARTIES

1. Plaintiff ZHOIE PEREZ (hereinafter referred to as "Plaintiff") is, and at all times relevant herein was, a resident in County of Los Angeles, California.

2. Plaintiff is informed and believes, and thereon alleges, that Defendant EDDUIN ZELAYA GRUNFELD (hereinafter "GRUNFELD"), is, and at all times mentioned herein was, an individual residing in the County of Los Angeles, in the State of California. Plaintiff is further informed and believes that Defendant GRUNFELD committed the acts of wrongdoing alleged herein under the course and scope of his employment with Defendants ETZ JACOB TORAH CENTER and OHEL CHANA HIGH SCHOOL, and at their direction.

3. Plaintiff is informed and believes, and thereon alleges, that Defendant ETZ JACOB TORAH CENTER (hereinafter referred to as "The Center") is and at all relevant times was a California business entity form unknown, who was authorized to do, has regularly done, and is doing, business in the State of California, under and by virtue of laws of the State of California.

4. Plaintiff is informed and believes, and thereon alleges, that Defendant OHEL CHANA HIGH SCHOOL is and at all relevant times was a California business entity form unknown, who was authorized to do, has regularly done, and is doing, business in the State of California, under and by virtue of laws of the State of California.

5. Plaintiff is informed, believes and thereon alleges that at all times relevant and mentioned herein, Defendants, including DOES 1 through 50, Inclusive, and each of them, were the agents, servants, employees, employers, co-conspirators, and/or joint venturers of their co-Defendants, and each of them, was acting within the course, scope and authority of said agency, employment and/or venture, and that each and every Defendant, as aforesaid, when acting as a principal, was negligent in the selection and hiring, retention, training and supervision of each and every other Defendant as an agent, employee and/or joint venturer.

6. The true names and capacities, whether individual, plural, corporate, partnership, associate, or otherwise, of DOES 1 through 50, inclusive, are unknown to Plaintiff, who therefore sues said defendants by such fictitious names. The full extent of the facts linking such fictitiously sued defendants is unknown to Plaintiff. Plaintiff is informed and believes and thereon alleges that

1 each of the defendants designated herein as a DOE was, and is, negligent, or in some other
2 actionable manner, responsible for the events and happenings hereinafter referred to, and thereby
3 negligently, or in some other actionable manner, legally and proximately caused the hereinafter
4 described injuries and damages to Plaintiff. Plaintiff will hereafter seek leave of the Court to
5 amend this Complaint to show the defendants' true names and capacities after the same have been
6 ascertained.

JURISDICTION AND VENUE

8 7. The acts which are the subject of this complaint took place at or near 7663 Beverly
9 Blvd. in the County of Los Angeles, California.

10 8. This Court has jurisdiction because the alleged acts and omissions giving rise to the
11 allegations contained herein occurred in the County of Los Angeles and the Defendants either live
12 in or conduct business in the State of California, County of Los Angeles.

13 9. Venue is proper in this county in accordance with California Code of Civil
14 Procedure §§ 395(a) and 395.5 because the obligation or liability arose in this county and breaches
15 occurred in this county.

GENERAL ALLEGATIONS

17 10. At all times relevant herein, Plaintiff was a 45 year old transgender woman.

18 11. On or about the early afternoon of February 14, 2019, Plaintiff was returning back
19 from a doctor's appointment at nearby Cedars Sinai Hospital while on the 7600 block of Beverly
20 Boulevard.

12. As Plaintiff was returning from her medical appointment, and passing by The
Center, she observed the ornate architecture and stained glass windows of the building and was
intrigued by it. Plaintiff lawfully stopped on the public sidewalk to look at and take pictures of the
building. At the time, Plaintiff was unaware that the building was a synagogue and/or part of a
school.

13. In response, Defendant GRUNFELD, who was dressed in tactical riot gear attire and
armed with a handgun, came out of The Center's locked wrought-iron front gate and onto the public
sidewalk to approach Plaintiff. At that time, Plaintiff remained lawfully and non-violently standing

1 on the public sidewalk.

2 14. Defendant GRUNFELD aggressively approached Plaintiff coming within feet of her
3 and putting his hand on his gun. Defendant GRUNFELD began to question what Plaintiff was
4 doing and ordered that she leave the property even though she was on public property.

5 15. Plaintiff remained on the public sidewalk and continued to non-violently record
6 Defendant GRUNFELD with her cellular phone to document their interaction. At all times relevant
7 herein, Plaintiff's lawful and non-violent recording of her interaction with Defendant GRUNFELD
8 while standing on public property was a protected exercise of her free speech rights guaranteed
9 under the California and United States Constitution.

10 16. Following Plaintiff's lawful recording of the interaction, Defendant GRUNFELD
11 became belligerent and without provocation, justification, or reason began to harass, intimidate,
12 coerce, and threaten Plaintiff with deadly force, including without limitation, repeatedly pointing
13 his finger and gun at Plaintiff's face, yelling at and threatening to shoot Plaintiff, making physically
14 threatening gestures, and continuously grabbing his gun and pointing it at Plaintiff, all in an attempt
15 to terrorize and frighten Plaintiff and/or instigate a physical altercation.



1 17. When Plaintiff lawfully refused to leave the public sidewalk and/or stop recording
2 the interaction, Defendant GRUNFELD left the public sidewalk area and returned back into The
3 Center. Defendant GRUNFELD thereafter reappeared behind a locked wrought-iron gate on
4 Beverly Blvd. directly across the street from a popular market and café known as Erewhon. At the
5 time of the incident, customers of the market were present eating on or near the sidewalk directly
6 across the street from The Center.

7 18. From behind the locked wrought-iron gate on Beverly Blvd., Defendant
8 GRUNFELD continued to harass, threaten, and intimidate Plaintiff who remained at all times on
9 the public sidewalk approximately 6 to 8 feet away from the gate.

10 19. From behind the locked wrought-iron gate, Defendant GRUNFELD drew his
11 weapon and pointed it at Plaintiff for no reason other than Plaintiff's exercise of her right to exist as
12 a transgender woman and to exercise
13 her constitutional rights.

14 20. From behind the locked
15 wrought-iron gate, Defendant
16 GRUNFELD pointed his gun in the
17 direction of the market, the people
18 eating at the market, and Plaintiff and
19 threatened to shoot Plaintiff dead.

20 21. From behind the locked
21 wrought-iron gate, Defendant
22 GRUNFELD pulled the trigger and
23 shot his weapon in the direction of the
24 market, the people eating at the market,
25 and Plaintiff.

26 22. From behind the locked
27 wrought-iron gate, Defendant
28 GRUNFELD shot Plaintiff in the leg.



1 23. Had Defendant GRUNFELD missed Plaintiff, his bullet would have gone into the
2 market area across the street where people were shopping and eating during the busy lunch hour.

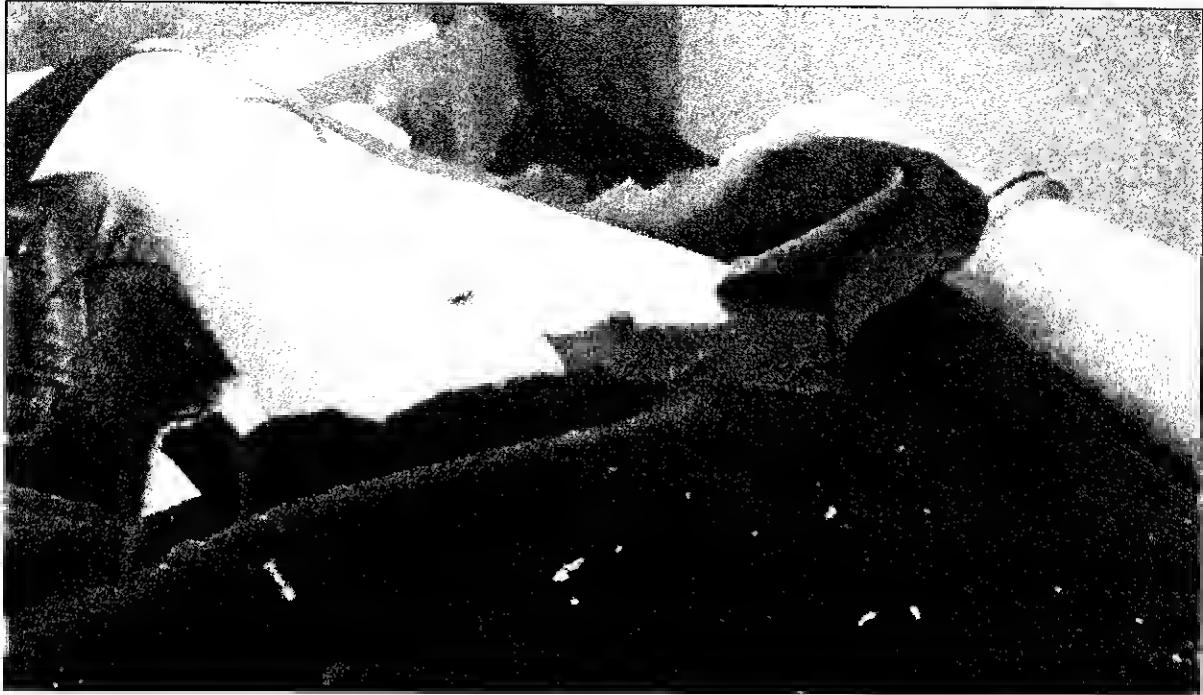
3 24. Defendant GRUNFELD's shooting of his weapon at Plaintiff was done intentionally
4 with the intent to hurt and/or kill Plaintiff. Alternatively, Defendant GRUNFELD's shooting of his
5 weapon at Plaintiff was done with reckless disregard to the rights and safety of Plaintiff and all
6 other persons in the area, including without limitation, persons at the market and café across the
7 street.

8 25. Plaintiff is informed and believes, and thereon alleges Defendant GRUNFELD shot
9 Plaintiff because Plaintiff exercised her right to exist as a transgender woman on a public sidewalk
10 and exercise her constitutional rights of free speech.

11 26. As a result of the gunshot wound to her leg, Plaintiff collapsed and fell onto the
12 sidewalk area where she had been standing. In response, Defendant GRUNFELD left the gated
13 area, came out onto the sidewalk with his gun drawn and told Plaintiff that next time he would
14 shoot her "for real" meaning that he would shoot to kill her.

15 27. Thereafter, Defendants, and each of them, caused Plaintiff to be handcuffed to her
16 gurney while she was bleeding and in pain from the bullet wound caused by Defendant
17 GRUNFELD.





FIRST CAUSE OF ACTION FOR ASSAULT AND BATTERY
(BY PLAINTIFF AGAINST ALL DEFENDANTS)

28. Plaintiff incorporates herein by reference, each and every allegation and statement contained in paragraphs 1 through 27, *supra*, as if the same had been set forth fully below.

29. Defendants, and each of them, did commit the assault upon plaintiff during the attack by causing Plaintiff to have an imminent apprehension of further harmful and offensive contact and great fear and apprehension of immediate bodily harm and threats of deadly force, including without limitation, Defendant GRUNFELD repeatedly pointing his finger and gun at Plaintiff's face, yelling at and threatening to shoot Plaintiff, making physically threatening gestures, and continuously grabbing his gun and pointing it at Plaintiff, all in an attempt to terrorize and frighten Plaintiff and/or instigate a physical altercation.

30. Defendants, and each of them, did commit the battery upon Plaintiff by physically attacking and subjecting plaintiff to harmful and offensive contact when Defendant GRUNFELD shot Plaintiff in the leg with a gun.

31. In doing the wrongful acts alleged herein, Defendants, and each of them, did so with the intent to make contact with Plaintiff's person and/or to place the Plaintiff in apprehension of a

1 harmful or offensive contact, including threats of deadly force.

2 32. Plaintiff did not at any time consent to any of the wrongful conduct of Defendants,
3 and each of them.

4 33. Plaintiff was harmed and offended by Defendants' wrongful conduct described
5 hereinabove.

6 34. As a direct, legal and proximate cause of the aforementioned conduct of Defendants,
7 and each of them, including Does 1 through 50, Inclusive, Plaintiff suffered injuries to her physical
8 health, strength and activity, and shock and injury to her nervous system, all of which said injuries
9 have caused, and continue to cause her great physical, mental, and nervous pain and suffering.
10 Plaintiff is further informed and believes, and thereon alleges that said injuries may or will result in
11 permanent disability, all to her general damages in an amount which will be stated according to
12 proof, but are in an amount that exceeds the minimum jurisdiction of this Court.

13 35. As a further direct and proximate cause of the aforementioned conduct of
14 Defendants, and each of them, including Does 1 through 50, Inclusive, Plaintiff has employed and
15 will have to employ the services of hospitals, physicians, surgeons, nurses, and the like to care for
16 and treat Plaintiff. Hospital, medical, professional, and incidental expenses were incurred, and will
17 be incurred, of which the exact amount will be stated according to proof.

18 36. As a further direct and proximate cause of the aforementioned conduct of
19 Defendants, and each of them, including Does 1 through 50, Inclusive, Plaintiff has incurred and
20 will continue to incur economic losses in an amount to be stated according to proof.

21 37. The conduct of Defendants, and each of them, was willful, malicious, oppressive,
22 and/or reckless, and done with the intent to oppress plaintiff and with a conscious disregard for
23 plaintiff's safety and well-being. Further, the foregoing intentional acts subjected Plaintiff to cruel
24 and unjust hardship in conscious disregard of Plaintiff's rights. As a result of the foregoing,
25 Plaintiff is entitled to punitive damages against Defendants, and each of them, in an amount
26 according to proof.

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SECOND CAUSE OF ACTION FOR FALSE IMPRISONMENT

(BY PLAINTIFF AGAINST ALL DEFENDANTS)

3 38. Plaintiff incorporates herein by reference, each and every allegation and statement
4 contained in paragraphs 1 through 37, *supra*, as if the same had been set forth fully below.

5 39. On February 14, 2019, at various times both before and after Plaintiff was shot and
6 maimed by the gunshot wound from Defendant GRUNFELD, Plaintiff was unlawfully and
7 unreasonably deprived of her freedom of movement by use of threats of force, threats of deadly
8 force, physical force, menace, and unreasonable duress by Defendants, and each of them.

9 40. As a result of Defendants' wrongful conduct, Plaintiff was unlawfully and
10 unreasonably handcuffed, detained, confined, falsely imprisoned, and deprived of her liberty
11 against her will.

12 41. At no time did Plaintiff consent to her unlawful and unreasonable detention,
13 confinement, false imprisonment, and/or deprivation of her liberty which was instigated,
14 perpetuated, and carried out by Defendants, and each of them.

15 42. As a direct, legal and proximate cause of the aforementioned conduct of Defendants,
16 and each of them, including Does 1 through 50, Inclusive, Plaintiff suffered injuries to her physical
17 health, strength and activity, and shock and injury to her nervous system, all of which said injuries
18 have caused, and continue to cause her great physical, mental, and nervous pain and suffering.
19 Plaintiff is further informed and believes, and thereon alleges that said injuries may or will result in
20 permanent disability, all to her general damages in an amount which will be stated according to
21 proof, but are in an amount that exceeds the minimum jurisdiction of this Court.

22 43. As a further direct and proximate cause of the aforementioned conduct of
23 Defendants, and each of them, including Does 1 through 50, Inclusive, Plaintiff has employed and
24 will have to employ the services of hospitals, physicians, surgeons, nurses, and the like to care for
25 and treat Plaintiff. Hospital, medical, professional, and incidental expenses were incurred, and will
26 be incurred, of which the exact amount will be stated according to proof.

27 44. As a further direct and proximate cause of the aforementioned conduct of
28 Defendants, and each of them, including Does 1 through 50, Inclusive, Plaintiff has incurred and

will continue to incur economic losses in an amount to be stated according to proof.

45. The conduct of Defendants, and each of them, was willful, malicious, oppressive, and/or reckless, and done with the intent to oppress plaintiff and with a conscious disregard for plaintiff's safety, well-being, and deprivation of her liberty. Further, the foregoing intentional acts subjected Plaintiff to cruel and unjust hardship in conscious disregard of Plaintiff's rights. As a result of the foregoing, Plaintiff is entitled to punitive damages against Defendants, and each of them, in an amount according to proof.

THIRD CAUSE OF ACTION FOR NEGLIGENCE

(BY PLAINTIFF AGAINST ALL DEFENDANTS)

46. Plaintiff incorporates herein by reference, each and every allegation and statement contained in paragraphs 1 through 45, *supra*, as if the same had been set forth fully below.

47. Plaintiff incorporates herein by reference, each and every allegation and statement contained in paragraphs 1 through 45, *supra*, as if the same had been set forth fully below.

48. Defendants, and each of them, had a duty to exercise ordinary or reasonable care in activities from which harm might reasonably be anticipated.

49. Defendants, and each of them, failed to use ordinary or reasonable care in their interactions with Plaintiff and negligently caused Plaintiff to be assaulted, battered, and falsely imprisoned as alleged herein.

50. As a direct, legal and proximate cause of the aforementioned conduct of Defendants, and each of them, including Does 1 through 50, Inclusive. Plaintiff suffered injuries to her physical health, strength and activity, and shock and injury to her nervous system, all of which said injuries have caused, and continue to cause her great physical, mental, and nervous pain and suffering. Plaintiff is further informed and believes, and thereon alleges that said injuries may or will result in permanent disability, all to her general damages in an amount which will be stated according to proof, but are in an amount that exceeds the minimum jurisdiction of this Court.

51. As a further direct and proximate cause of the aforementioned conduct of Defendants, and each of them, including Does 1 through 50, Inclusive, Plaintiff has employed and will have to employ the services of hospitals, physicians, surgeons, nurses, and the like to care for

1 and treat Plaintiff. Hospital, medical, professional, and incidental expenses were incurred, and will
2 be incurred, of which the exact amount will be stated according to proof.

3 52. As a further direct and proximate cause of the aforementioned conduct of
4 Defendants, and each of them, including Does 1 through 50, Inclusive, Plaintiff has incurred and
5 will continue to incur economic losses in an amount to be stated according to proof.

6 53. The conduct of Defendants, and each of them, was willful, malicious, oppressive,
7 and/or reckless, and done with the intent to oppress plaintiff and with a conscious disregard for
8 plaintiff's safety, well-being, and deprivation of her liberty. Further, the foregoing intentional acts
9 subjected Plaintiff to cruel and unjust hardship in conscious disregard of Plaintiff's rights. As a
10 result of the foregoing, Plaintiff is entitled to punitive damages against Defendants, and each of
11 them, in an amount according to proof.

12 **FOURTH CAUSE OF ACTION FOR VIOLATION OF THE RALPH CIVIL RIGHTS ACT**

13 **PURSUANT TO CIVIL CODE SECTION 51.7**

14 **(BY PLAINTIFF AGAINST ALL DEFENDANTS)**

15 54. Plaintiff incorporates herein by reference, each and every allegation and statement
16 contained in paragraphs 1 through 53, *supra*, as if the same had been set forth fully below.

17 55. At all times mentioned herein above, Plaintiff was the subject of harassment,
18 discrimination, threats of violence, intimidation by threat of violence, and violence itself by
19 Defendants, and each of them, due at least in part to Plaintiff's gender, race, and/or ancestry. Ms.
20 Perez is a transgender female.

21 56. Said acts constitute a violation of the Unruh Civil Rights Act, Civil Code § 51 et
22 seq. and the Ralphs Civil Rights Act, Civil Code § 51.7, as well as the California Constitution and
23 various other state legislative enactments.

24 57. As a result of Defendants, and each of their wrongful and illegal conduct as
25 alleged herein, Plaintiff is entitled to reasonable attorneys' fees and costs of said suit and a civil
26 penalty of \$25,000.00 as provided in Cal. Civil Code § 52.

27 58. Furthermore, a result of Defendants, and each of their wrongful and illegal conduct
28 as alleged herein, Plaintiff is entitled to a civil penalty and exemplary damages as provided in Cal.

1 Civil Code § 52.

2 59. The conduct of Defendants, and each of them, was willful, malicious, oppressive,
3 and/or reckless, and done with the intent to oppress plaintiff and with a conscious disregard for
4 plaintiff's safety, well-being, and deprivation of her liberty. Further, the foregoing intentional acts
5 subjected Plaintiff to cruel and unjust hardship in conscious disregard of Plaintiff's rights. As a
6 result of the foregoing, Plaintiff is entitled to punitive damages against Defendants, and each of
7 them, in an amount according to proof.

8 **FIFTH CAUSE OF ACTION FOR VIOLATION OF THE BANE CIVIL RIGHTS ACT**

9 **PURSUANT TO CIVIL CODE SECTION 52.1**

10 **(BY PLAINTIFF AGAINST ALL DEFENDANTS)**

11 60. Plaintiff incorporates herein by reference, each and every allegation and statement
12 contained in paragraphs 1 through 59, *supra*, as if the same had been set forth fully below.

13 61. At all times mentioned herein above, Plaintiff was the subject of harassment,
14 discrimination, threats of violence, intimidation by threat of violence, and violence itself by
15 Defendants, and each of them, due at least in part to Plaintiff's gender, race, and/or ancestry. Ms.
16 Perez is a transgender female.

17 62. Defendants, and each of them, indeed did interfere – through threats, intimidation,
18 coercion, and violence – with Plaintiff's exercise and enjoyment of her rights secured by the
19 Constitution and laws of the United States and the Constitution and laws of the State of California.

20 63. Namely, Defendants, and each of them, attempted to and indeed did interfere –
21 through threats, intimidation, coercion, and violence – with Plaintiff's exercise and enjoyment of
22 her First Amendment rights to free speech and her right to be free from violence motivated by her
23 gender, race, ancestry, and/or national origin. Defendants and each of their actions were in
24 violation of, without limitation, Plaintiffs First and Fourteenth Amendment rights; as well as
25 California Civil Code §§ 43, 51 et seq., and 51.7; California Penal Code §§ 240, 241, 242, 243,
26 422.6, 422.7, 422.8, 1170.75; as well as the California Constitution; and common law interpreting
27 the California Constitution and the statutes enacted by the State of California.

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64. Said acts constitute a violation of the Unruh Civil Rights Act, Civil Code § 51 et seq. and the Bane Civil Rights Act, Civil Code § 52.1, as well as the California Constitution and various other state legislative enactments.

65. As a result of Defendant's and his agents' and/or employees' illegal acts as alleged herein, Plaintiff is entitled to reasonable attorneys' fees and costs of said suit and a civil penalty of \$25,000.00 as provided in Cal. Civil Code § 52.

66. Furthermore, as a result of Defendants, and each of their wrongful and illegal conduct as alleged herein, Plaintiff is also entitled to three times their actual damages, which in no case shall be less than \$4,000.00.

67. The conduct of Defendants, and each of them, was willful, malicious, oppressive, and/or reckless, and done with the intent to oppress plaintiff and with a conscious disregard for plaintiff's safety, well-being, and deprivation of her liberty. Further, the foregoing intentional acts subjected Plaintiff to cruel and unjust hardship in conscious disregard of Plaintiff's rights. As a result of the foregoing, Plaintiff is entitled to punitive damages against Defendants, and each of them, in an amount according to proof.

68. Plaintiff shall further be entitled to appropriate equitable remedies to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff ZHOIE PEREZ prays for judgment against all Defendants, and each of them, including Does 1 through 50, Inclusive, as follows:

On Plaintiff's First Cause of Action for Assault and Battery as follows:

1. For general damages in an amount to be proven at trial;
 2. For special damages in an amount to be proven at trial; and
 3. For exemplary and punitive damages according to proof at the time of trial.

On Plaintiffs' Second Cause of Action for False Imprisonment as follows:

1. For general damages in an amount to be proven at trial;
 2. For special damages in an amount to be proven at trial; and
 3. For exemplary and punitive damages according to proof at the time of trial.

1 **On Plaintiffs' Third Cause of Action for Negligence as follows:**

- 2 1. For general damages in an amount to be proven at trial;
3 2. For special damages in an amount to be proven at trial; and
4 3. For exemplary and punitive damages according to proof at the time of trial.

5 **On Plaintiffs' Fourth Cause of Action For Violation of The Ralph Civil Rights Act, Civil Code**

6 **§ 51.7 as follows:**

- 7 1. For general damages in an amount to be proven at trial;
8 2. For special damages in an amount to be proven at trial;
9 3. For a civil penalty of \$25,000.00;
10 4. For exemplary and punitive damages according to proof at the time of trial; and
11 5. For attorneys' fees according to proof at the time of trial.

12 **On Plaintiffs' Fifth Cause of Action For Violation of The Banc Civil Rights Act, Civil Code §**

13 **52.1 as follows:**

- 14 1. For general damages in an amount to be proven at trial;
15 2. For special damages in an amount to be proven at trial;
16 3. For treble actual damages, which in no case shall be less than \$4,000.00;
17 4. For a civil penalty of \$25,000.00;
18 5. For exemplary and punitive damages according to proof at the time of trial; and
19 6. For attorneys' fees according to proof at the time of trial.

20 **As to all Causes of Action:**

- 21 1. For costs of suit incurred herein;
22 2. For pre-judgment and post-judgment interest as permitted by law; and
23 3. For such other and further relief as the Court deems just and proper.

24 Dated: March 12, 2019

CARPENTER ZUCKERMAN & ROWLEY

25 BY _____
26 JOHN C. CARPENTER
27 BRIAN J. KIM
28 Attorneys for Plaintiff,
 ZHOIE PEREZ

DEMAND FOR JURY TRIAL

Plaintiff ZHOIE PEREZ hereby demands a trial of all causes by jury.

Dated: March 12, 2019

CARPENTER ZUCKERMAN & ROWLEY

BY

JOHN C. CARPENTER
BRIAN J. KIM
Attorneys for Plaintiff,
ZHOUE/PEREZ